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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 ROBERT BELL, in his Personal Capacity and
10 as Administrator of the Estate of MATTHEW
11 BELL, deceased; and LESLIE BELL, in her
12 Personal Capacity,

11 Plaintiffs,

12 v.

13 KING COUNTY PUBLIC HOSPITAL
14 DISTRICT #1 d/b/a VALLEY MEDICAL
15 CENTER; et al.,

16 Defendants.

NO. 2:18-cv-00906-MJP

**STIPULATED MOTION AND
ORDER TO ENLARGE TIME TO
REOPEN**

17 **I. STIPULATION**

18 The Parties hereby agree to the following:

- 19 1. The Parties have come to a resolution in principal.
- 20 2. Because of the complex nature of the resolution, which involves numerous high-
21 level stakeholders and changes to Defendants' established policy and procedure, the precise terms
22 of the settlement agreement are, however, still being worked out.
- 23 3. On May 31, 2019, the Court dismissed this action, but granted the Parties sixty
24 (60) days to perfect settlement.

4. On July 23, 2019, Counsel for Plaintiffs and Defendants met and conferred, and it was relayed to counsel for Plaintiffs that Defendants would likely not be able to devise a counterproposal on or before July 31, 2019.

5. Plaintiffs agreed to give Defendants thirty (30) days to devise a counterproposal, until August 20, 2019.

6. In order to preserve Plaintiffs' right to reopen this case if the Parties are not able to come to a final resolution, the Parties have agreed to jointly move the Court for an Order allowing the Parties an additional sixty (60) days to move to reopen the case.

II. MOTION

Pursuant to the above stipulation, the Parties respectfully request that the Court allow the Parties an additional sixty (60) days to reopen the case, should settlement not be perfected.

DATED August 1, 2019.

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3 /s/ Daniel F. Mullin
4 Daniel F. Mullin, WSBA #12768
5 Attorneys for Defendants Whitney Alexander,
6 M.D., and Jeffrey Goon, PA

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8 **III. ORDER**

9 THIS MATTER having come before the Court upon the Parties' Stipulated Motion to
10 Enlarge Time to Reopen, the Court having examined the records and file and being fully informed,
11 now GRANTS the Parties Stipulated Motion to Enlarge Time to Reopen. The Parties are hereby
12 GRANTED an additional sixty (60) days to reopen the case, should settlement not be perfected.

13 DATED this 1st day of __August__, 2019.

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16 Marsha J. Pechman
17 United States Senior District Judge
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